

BRUCE A. BLAKEMAN
County Executive



THOMAS A. ADAMS
County Attorney

**COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY**

February 22, 2025

Honorable Judge Nina R. Morrison
United States District Court for the Eastern District of New York
Theodore Roosevelt United States Courthouse
225 Cadman Plaza East, Brooklyn, New York 11201

Re: *Carl Semencic v The County of Nassau, et al*
Civil Case No.: 18-cv-05244-NRM-AYS

Dear Your Honor:


Pursuant to the Court's instructions, Defendants submit this letter to provide an update on their efforts to obtain statements from the Franklin Square and Munson Fire Department, as well as an explanation regarding the timing of the submission of the incident report from Mr. Daniel Maloney listed as Defendants' Exhibit H.

Following the Court's directive, I contacted the secretary of the Franklin Square and Munson Fire Department, Fire Chief Joseph Gerrato, and the prior law firm that represented Mr. Maloney and the fire department, Bee Ready Fishbein Hatter & Donovan, LLP. Each of these parties confirmed that no additional documents or statements exist beyond the one-page incident report previously submitted. Neither I nor the Nassau County Attorney's Office has ever represented the Franklin Square and Munson Fire Department or its members in this matter.

Defendants received the incident report from Mr. Maloney after a meeting on February 14, 2025, and promptly provided it to Plaintiff's counsel that same day. The extent to which this document was previously included in discovery remains unclear, as I was re-assigned to this case at the end of January and had no prior knowledge of its existence. Out of an abundance of caution, I provided it to Plaintiff's counsel immediately upon receipt. Its production was not delayed intentionally but was provided at the earliest opportunity available to Defendants.

Defendants remain available to address any further inquiries from the Court regarding this submission.

Respectfully,



John Carnevale, Esq.
Deputy County Attorney

**1 WEST STREET, MINEOLA, NEW YORK 11501-4820
PHONE – 516-571-3056 | FAX – 516-571-6684, 6604**